

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Roxanne Flores,

Plaintiff,

v.

Diversified Collection Services, Inc.
c/o CT Corporation System
208 S. LaSalle Street, Suite 814
Chicago, IL 60604,

Defendant.

Case No.

COMPLAINT

Jury Demand Requested

JURISDICTION AND VENUE

- 1- This court has jurisdiction pursuant to 28 U.S.C. §1331 and 15 U.S.C. §1692k(d).
- 2- Venue is proper because a substantial part of the events giving rise to this claim occurred in this District.

PARTIES

- 3- Plaintiff incurred an obligation to pay money, the primary purpose of which was for personal, family, or household uses (the "Debt").
- 4- Plaintiff is a resident of the State of Illinois.
- 5- Defendant is a corporation with its principal office in the State of California.
- 6- Defendant uses instruments of interstate commerce for its principal purpose of business, which is the collection of debts.
- 7- Defendant regularly attempts to collect, or attempts to collect, debts owed or due another.
- 8- At all times relevant, Defendant owned the Debt or was retained to collect the Debt.

FACTS COMMON TO ALL COUNTS

- 9- On or around October 10, 2011, Defendant telephoned Plaintiff's neighbor ("Neighbor").

10- During this communication, Defendant disclosed the existence, nature, and/or amount of the Debt to Neighbor.

11- During this communication, Defendant interrogated Neighbor about Plaintiff's employment and family situation.

12- Defendant damaged Plaintiff.

13- Defendant violated the FDCPA.

COUNT I

14- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

15- Defendant violated 15 USC § 1692b(1) by disclosing Defendant's identity to a person other than Plaintiff.

COUNT II

16- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

17- Defendant violated 15 USC § 1692b(2) by disclosing the existence, nature, and/or amount of the Debt to a person other than Plaintiff.

COUNT III

18- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

19- Defendant violated 15 USC § 1692f by engaging in unfair and/or unconscionable means to collect, or attempt to collect, the Debt.

JURY DEMAND

20- Plaintiff demands a trial by jury.

PRAYER FOR RELIEF

21- Plaintiff prays for the following relief:

- a. Judgment against Defendant for Plaintiff's actual damages, as determined at trial, suffered as a direct and proximate result Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(1);
- b. Judgment against Defendant for \$1,000 in statutory damages for Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(2)(A);
- c. Judgment against Defendant for Plaintiff's reasonable attorney's fees and costs incurred in this action, pursuant to 15 U.S.C. §1692k(a)(3);
- d. Any other legal and/or equitable relief as the Court deems appropriate.

RESPECTFULLY SUBMITTED,

Meier LLC

By: /s/ Richard J. Meier

Richard J. Meier, Esq.

53 W. Jackson Blvd., Suite 709

Chicago, IL 60604

Tel: 312-242-1849

Fax: 312-242-1841

richard@meierllc.com

Attorney for Plaintiff